

30 March 2011

Mr. Craig Schwartz  
Chief gTLD Registry Liaison  
ICANN  
4676 Admiralty Way, Suite 330  
Marina del Rey, CA 90292

Re: RSEP 2008008

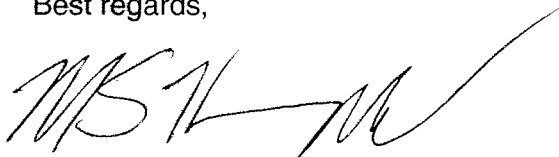
Dear Craig,

Pursuant to RSEP 2008008, Afilias proposed an equitable phased reallocation of non-compliant Sunrise domain names. The phased reallocation of domain names is an allocation process originally used in connection with .MOBI's launch and which has since been used by a number of registries over the years including .BIZ, .COOP, .MOBI, and .ASIA. Most of the recent phased allocation processes by other registries have primarily relied upon the UDRP to handle any non-compliant registrations. However, in connection with the Afilias Sunrise phased reallocation it was proposed to use a pre-challenge process administered by WIPO prior to the final allocation as an enhanced safeguard mechanism. This process was modeled after the Pioneer Name Challenge Process which was designed in consultation with WIPO during the launch of the .ASIA gTLD.

Afilias has completed the first round of RFP allocations and would like to proceed with allocating these domain names. However given that some time has past since WIPO's original administration of the Sunrise Challenge process and other intervening factors, WIPO is currently unable to administer this challenge process. Therefore Afilias would like to propose the following process to comply with the letter and spirit of the original RSEP proposal. Afilias will move forward with the reallocation and challenge process as set forth in the RSEP, that is the process will be modeled after the .ASIA Pioneering Challenge process. However, instead of exclusively using WIPO to administer any challenges, Afilias will process any complaints during this challenge process and allocate them to any participating ICANN approved UDRP provider.

In the interest of openness and transparency, if ICANN believes this is a prudent path forward, can you please post this communication as an addendum to the original Afilias RSEP 2008008 request.

Best regards,



M. Scott Hemphill  
VP & General Counsel